

DANE LEITNER (*pro hac vice* application forthcoming)

Email: [Dleitner@warddamon.com](mailto:Dleitner@warddamon.com)

KENNETH M. REHNS (*pro hac vice* application forthcoming)

Email: [krehns@warddamon.com](mailto:krehns@warddamon.com)

WARD DAMON PL

4420 Beacon Circle

West Palm Beach, FL 33407

Telephone: (561) 842-3000

CONSTANCE J. YU (SBN 182704)

Email: [cyu@plylaw.com](mailto:cyu@plylaw.com)

PUTTERMAN | YU LLP

345 California St. | Suite 1160

San Francisco, CA 94104

Tel. (415) 839-8779

Fax. (415) 737-1363

*Attorneys for Defendants National*

*Health Agents, LLC and Interstate Brokers*

*Of America, LLC*

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

RICHARD TUSO, on behalf of himself and  
others similarly situated,

Plaintiff,

vs.

NATIONAL HEALTH AGENTS, LLC, ET  
AL.,

Defendants.

Case No.: 2:20-cv-02130-JAM-CKD

STIPULATION EXTENDING TIME TO  
ANSWER

**STIPULATION AND ORDER EXTENDING TIME TO ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT**

WHEREAS, the above-captioned lawsuit was filed by Plaintiff Richard Tusso on October 20, 2020, alleging violations of the Telephone Consumer Protection Act of 1990, 47 U.S.C. §227, et. seq., and the regulation promulgated thereunder, 47 C.F.R. §§ 64.1200(d).

WHEREAS, Defendants, National Health Agents, LLC and Interstate Brokers of America, LLC (“Defendants”) were first served with a copy of the Complaint on November 18, 2020;

WHEREAS, Counsel for the Parties have agreed to an extension of time for these Defendants to Answer or otherwise respond to Plaintiff's Complaint in order to allow Defendants time to investigate the allegations and claims set forth in Plaintiff's Complaint;

WHEREAS, this is the first request for an extension of time to move, answer or otherwise respond in this action. Because no scheduling order has been entered in this action, the extension of time stipulated to herein will not affect any other scheduled dates.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, as follows:

1. Defendants National Health Agents, LLC and Interstate Brokers Association of America shall have a 30-day extension, up to and including, January 4, 2021 to Answer or otherwise respond to Plaintiff's Complaint.

Dated this \_\_\_\_ of December 2020.

<u>/s/</u>  Rachel E. Kaufman Kaufman P.A. 400 NW 26 <sup>th</sup> Street Miami, FL 33127 Tel: 305-469-5881 <a href="mailto:rachel@kaufmanpa.com">rachel@kaufmanpa.com</a>  <i>Attorneys for Plaintiff</i>	<u>/s/</u>  Constance J. Yu (SBN 182704) Putterman   Yu LLP 345 California St.   Suite 1160 San Francisco, CA 94104 Email: <a href="mailto:cyu@plylaw.com">cyu@plylaw.com</a> Tel. (415) 839-8779 Fax. (415) 737-1363  Dane Leitner ( <i>pro hac vice</i> application forthcoming) <a href="mailto:Dleitner@warddamon.com">Dleitner@warddamon.com</a> Kenneth M. Rehns ( <i>pro hac vice</i> application forthcoming) <a href="mailto:krehns@warddamon.com">krehns@warddamon.com</a> Ward Damon PL 4420 Beacon Circle West Palm Beach, FL 33407 Tel: (561) 842-3000 Fax: (561) 842-3626  <i>Attorneys for Defendants National Health Agents, LLC and Interstate Brokers of America, LLC</i>
---	---

1 Pursuant the Parties' stipulation, IT IS SO ORDERED.

2  
3 DATED: December 8, 2020

/s/ John A. Mendez

4 THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE